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8 **UNITED STATES DISTRICT COURT**

9 **DISTRICT OF NEVADA**

10 UNITED STATES OF AMERICA,

11 Plaintiff,

12 v.

13 TIMOTHY J. WALKER,

14 Defendant.  
15

Case No. 16-CR-042-JAD-PAL

**STIPULATION TO CONTINUE  
SENTENCING HEARING  
(First Request)**

16 IT IS HEREBY STIPULATED AND AGREED, by and between Daniel G. Bogden,  
17 United States Attorney, and Elham Roohani, Assistant United States Attorney, counsel for the  
18 United States of America, and Rene L. Valladares, Federal Public Defender, and William  
19 Carrico, Assistant Federal Public Defender, counsel for Timothy J. Walker, that the Sentencing  
20 Hearing currently scheduled on October 17, 2016 at 9:00 a.m., be vacated to a date and time  
21 convenient to the Court, but no sooner than forty five (45) days.

22 This Stipulation is entered into for the following reasons:

- 23 1. The defendant is not in custody and agrees with the need for the continuance.  
24 2. Counsel for the Government will be in trial during the scheduled hearing and  
25 needs additional time to prepare.  
26 3. Denial of this request for continuance could result in a miscarriage of justice.

4. The parties agree to the continuance.

This is the first request for a continuance of the sentencing hearing.

DATED this 5<sup>th</sup> day of June, 2016.

RENE L. VALLADARES  
Federal Public Defender

DANIEL G. BOGDEN  
United States Attorney

By /s/ William Carrico  
WILLIAM CARRICO  
Assistant Federal Public Defender

By /s/ Elham Roohani  
ELHAM ROOHANI  
Assistant United States Attorney

## ORDER

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